

Marc S. Dreier (MD-9713)  
Joel A. Chernov (JC-8789)  
Regina M. Alter (RA-7014)  
DREIER LLP  
499 Park Avenue  
New York, New York 10022  
(212) 328-6100

*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MARCO BORGRA, <i>et al.</i> ,	:	07 CV 5807 (TPG)
	:	
Plaintiffs,	:	
	:	<b><u>NOTICE OF MOTION</u></b>
-against-	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
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PLEASE TAKE NOTICE THAT upon the annexed declarations of Alfredo Carlos Alzaga, dated January 4, 2008 (the "Alzaga Dec."); Miguel Alberto Balestrini, dated December 31, 2007 (the "Balestrini Dec."); Marco Borgra, both dated December 20, 2007 (the "Borgra Dec."); Mariana Noemi Tauss, dated December 14, 2007 (the "Tauss Dec."); Horacio Tomas Liendo, dated December 19, 2007 (the "Liendo Dec."); Atilio Luis Pocosgnich, dated January 29, 2008 (the "Pocosgnich Dec."); Alejandro R. Luppi, dated December 12, 2007 (the "Luppi Dec."); and Regina Alter, dated January 31, 2008, with annexed exhibits; the Statement of Material Facts Pursuant to Local Rule 56.1; the accompanying Memorandum of Law; and the pleadings and all prior proceedings had herein, the undersigned will move this Court before the Honorable Thomas P. Griesa, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York,

New York, at such time as the Court directs, for an Order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting plaintiffs summary judgment as against defendant the Republic of Argentina, to strike defendant's discovery requests, and for such other relief as the Court deems just and proper.

Dated: New York, New York  
January 31, 2008

**DREIER LLP**

By: 

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